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9 *Attorneys for Defendants Leap Forward Gaming, Inc.,
10 Mohammad Ali Saffari, Perry Cobb, and Bruce Cunningham*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 PEERLESS INDEMNITY INSURANCE
14 COMPANY, a foreign company,

15 **CASE NO.: 2:15-cv-02390-APG-CWH**

16 Plaintiff,

17 vs.

18 LEAP FORWARD GAMING, INC., a Nevada
19 company; MOHAMAD ALI SAFFARI, a
20 Nevada resident; PERRY COBB, a Nevada
21 resident; and BRUCE CUNNINGHAM, a
22 Nevada resident,

23 Defendants.

24 **STIPULATION AND ORDER EXTENDING TIME**
25 **(First Request Pursuant to Local Rule 16.1)**

26 Plaintiff Peerless Indemnity Insurance Company and Defendants Leap Forward Gaming,
27 Inc., Mohamad Ali Saffari, Perry Cobb, and Bruce Cunningham (collectively, the “Defendants”),
28 by and through their undersigned counsel, do hereby stipulate and agree that the Defendants
should have an additional three weeks extension of time to and including Tuesday, March 1,
2016, in which to file a response to the Plaintiff’s Complaint filed in the above-entitled action.

29 Good cause exists for such an extension, because the Defendants herein are currently
30 engaged in serious good-faith settlement negotiations with International Game Technology and
31 IGT (“IGT”), Plaintiffs in Case No. 2:15-cv-01842-APG-VCF, filed in the United States District
32 Court for the District of Nevada. The parties stipulate and agree that an extension will help

1 facilitate the pending settlement discussions. The parties certify that this stipulation is made in
2 good faith and not in an effort to cause delay. The Defendants have met on two occasions for
3 settlement discussions with IGT and have exchanged proposals. A settlement offer has been
4 made and it is being evaluated. Accordingly, the Defendants herein need an additional three
5 weeks in which to respond to Plaintiff's Complaint and are optimistic that settlement is feasible.
6

7 The time for the Defendants to file a response to the Complaint filed herein is presently
8 Tuesday, February 9, 2016. The Plaintiff and the Defendants stipulate and agree that the time for
9 the Defendants to file a response to the Complaint should be extended to and including March 1,
10 2016.

11 DATED this 9th day of February, 2016.
12

13 ROBISON, BELAUSTEGUI, SHARP & LOW
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71 Washington Street
15 Reno, Nevada 89503

16 /s/ Kent R. Robison
17 KENT R. ROBISON – NSB #1167
18 *Attorneys for Defendants Leap Forward Gaming, Inc.,
Mohamad Ali Saffari, Perry Cobb, and Bruce Cunningham*

19 DATED this 9th day of February, 2016.
20

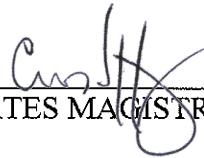
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24 /s/ Justin S. Hepworth
25 AMY M. SAMBERG – NSB #10212
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26 *Attorneys for Plaintiff
Peerless Indemnity Insurance Company*

27 **ORDER**

28 IT IS SO ORDERED.

DATED February 11, 2016


2 UNITED STATES MAGISTRATE JUDGE